June 14, 2024

The Honorable Chair and Members of the
Hawai'i Public Utilities Commission
465 South King Street
Kekuanaoa Building, 1st Floor
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Dkt 2024-0121 Double Pole Removal Plan
Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited
Hawaiian Electric Responses to Commission's Information Requests

The Hawaiian Electric Companies[1] herein submit the responses to the Commission's information requests, filed on May 31, 2024, regarding the Double Pole Removal Plan in the subject proceeding.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura
Director
Regulatory Non-Rate Proceedings

c: Division of Consumer Advocacy

[1] The "Hawaiian Electric Companies" or "Companies" refer to Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

PUC-HECO-IR-01

Reference: “Application Hawaiian Electric; Exhibit C; Verification,” filed on April 30, 2024 (“Application”), at 6. Application, Exhibit A at 44.

In the Application at 6, Hawaiian Electric states that “[g]iven that the backlog double poles have a finite quantity and because Hawaiian Electric is under an obligation to remove all of them by 2028, as part of the Stipulated Plan, Hawaiian Electric requests that the Commission seek State funding in the amount of $500,000 per year for the next four (4) years, until the backlog removals are complete.” However, prior to the filing of the Application, Hawaiian Electric stated on December 21, 2023, as seen in the Application Exhibit at 44, that Hawaiian Electric “estimated that an additional $2.1M to $2.5M per year over the remaining 5 years will be needed to address these backlog double poles.”

Please respond to the following:

a) Please clarify if the statements above refer to the removal of 1) only backlog double poles that require standard transfer and removal, or 2) the total of backlog double poles and preventive double poles that exist to date.

b) If the double poles referenced are only referring to the backlog double poles, then please confirm that Hawaiian Electric is not requesting additional funding to remove all preventive poles to date.

c) What type of State funding is Hawaiian Electric requesting that the Commission seek to fund this program?

d) Please provide a pro forma income statement for each island for the revenues received from joint pole attachments, that covers years 2024 to 2030.

e) Please provide Hawaiian Electric’s actual expenses for double pole removals for each island for years 2018 through present, and Hawaiian Electric’s annual budget for double pole removals for each island from present through 2035.

f) In the December 1, 2023 response, Hawaiian Electric stated it would need an additional $2.1M to $2.5M per year to address the backlog double poles, please explain in detail why the estimated amount required changed from $2.1M to $2.5M per year (as of December 1, 2023), to $500,000 per year (as of April 30, 2024) to address the same backlog, including a detailed breakdown by expense type, of the difference in the two cost estimates.

g) What is the estimated cost to remove a double pole that requires a standard transfer? Please provide a breakdown of the cost (i.e., materials, company labor, contractor labor, project coordination, etc.).

h) If Hawaiian Electric is not provided the additional funding of $500,000 per year to meet the ten-year commitment which ends on April 4, 2028 (ten years from the filing of Docket 2018-0075), as requested, please provide:

   i. the estimated number of double poles that can be removed per year for years 2024, 2025, 2026, 2027, and 2028.

   ii. the estimated balance of backlog and preventive double poles requiring standard transfers that will remain on April 4, 2028.

   iii. The estimated additional years required beyond April 4, 2028, to fully remove the double pole backlog, including preventive poles in existence as of April 4, 2028.

Hawaiian Electric Response:

a) The statements only apply to backlog double pole standard transfers and removals.

b) Hawaiian Electric is not requesting additional funds to address ongoing preventive double pole transfers and removals, unless new obligations are imposed on Hawaiian Electric via this docket that are not currently in practice and budgeted for. As noted in the response to CA-IR-8, however, if Hawaiian Electric had more funding, it could expedite the removal of the backlog double poles and focus more attention on removing and limiting the presence of new preventive double poles.

c) Hawaiian Electric is requesting that the Commission, in its report and recommendation to the Legislature, request State funding for Hawaiian Electric's double pole program. The Company does not provide a specific recommendation for what specific type of State funding the Commission requests.

d) The Company has not received any revenues from pole attachments for the years 2024-2039 and therefore does not have a pro forma to provide. However, the Company's Pole Infrastructure Enterprise ("PIE") Division annually files with the Commission its Division's profit and loss statement in Docket No. 2018-0075, which includes pole attachment revenues.

e) See below for Hawaiian Electric's actual expenses for double pole removals for each island for years 2018 through present.

Row Labels	Sum of Val/COArea Crcy
HELCO	**$1,637,272.27**
2019	$86.77
2020	$340,166.52
2021	$360,354.50
2022	$766,520.06
2023	$169,768.67
2024	$375.75
MECO	**$1,672,855.85**
2021	$292,854.82
2022	$1,168,823.45
2023	$50,371.96
2024	$160,805.62
HECO	**$13,248,544.56**
2019	$47,067.41
2020	$1,186,054.45
2021	$3,938,162.19
2022	$2,273,650.32
2023	$2,886,192.64
2024	$2,917,417.55
Grand Total	**$16,558,672.68**

For years 2024-2028, Hawaiian Electric is budgeting $3.124M annually for transfer and pole removal costs of approximately 1,300 standard transfer poles per year. By 2028, all backlog standard transfers will be completed. The Company does not yet have a planned budget for preventative double pole removals from 2028-2035.

f) The amount provided in December 2023 was an estimated amount to complete Hawaiian Electric's backlog standard transfers. As a result of the Legislative Report, the Commission's request, and the Stakeholder meetings, Hawaiian Electric committed to exploring new ways to structure the standard transfer contracts in order to allow bidders to reduce costs based on bulk commitments. The estimated amount to complete Hawaiian Electric's standard transfer backlog will be considerably less than what was estimated in December of 2023. Now that the Company has received bids for the updated RFP that show significantly lower pricing (*see*, Company response to CA-IR-7; Exhibit C to Application at pages 2, 5), the Company no longer requests the additional $500,000 to cover contractor costs for double pole removals. However, the Company still requests this additional funding in order to expedite the removal of backlog double pole and to offset unknown, incidental costs related to standard transfers for double pole removals. Throughout the subcommittee meetings, the idea of requesting state-funding for certain double pole expenses was discussed; however, no agreement was made between the parties as to what requested funds would cover, or who would request funds. Since this was Hawaiian Electric's Application, Hawaiian Electric chose to request $500,000 for four years to cover unexpected, and/or new expenses the Company may incur as a result of this docket and to accelerate the rate of removals.

g) The Company is reviewing bids from a newly-issued RFP and has not yet selected contractors and finalized pricing. Accordingly, the Company does not have costs broken down by the categories in this IR, but the Company can provide the below rough estimates for standard transfer and double pole removals based on the current RFP responses the Company has received.

Company	Cost
HECO	$1,742
HELCO	$2,000
MECO	$1,400

h)

i. The Company has committed to remove an estimated 1,300 poles per year for the next four and a half (4.5) years to complete the backlog. The Company commits to removing this number of backlog double poles regardless of additional funding.

ii. The Company is committed to removing all backlog double poles by 2028, and therefore anticipates that no backlog double poles will exist by the end of 2028. Even though Hawaiian Electric's and Hawaiian Telcom's agreements were signed in April of 2018, the Commission's Decision and Order was issued late in the year of 2018. Accordingly, Hawaiian Electric has based its commitment for removing all known standard transfer backlog double poles by end of year 2028.

iii. Backlog double poles are defined to specifically cover only the double poles in existence in the field as of the asset transfer with HT. Accordingly, no new backlog double poles are created. The Company is committed to removing all known backlog double poles by the end of 2028, and therefore anticipates that no known backlog double poles will exist by the end of 2028.

Preventive poles are created on a regular basis through the course of normal business; there is no date at which there will ever be zero double poles in the field. Please see the Company's Application in this docket at page 7, the Company's Application in docket 2018-0075 at pp. 18, 23, and D&O No. 35768 in Docket No. 2018-0075 at p. 28-29, for an explanation of the difference between backlog and preventive double poles. The Company is hopeful, however, that the Stipulated Agreement with all of the Stakeholders will help prevent the buildup of preventive double poles in the field, minimizing the number of preventive double poles and the duration that they are in the field.

PUC-HECO-IR-02

Reference: "Application Hawaiian Electric; Verification," filed on April 30, 2024 ("Application"), at 10 and 11. Application, Exhibit A, at 10. Application, Exhibit B, at 15. Application, Exhibit B, at 3.

In the Application at 10 and 11, Hawaiian Electric states that "[t]he Parties have agreed to sixteen specific stipulations," including "[t]agging of new and existing equipment so ... the public can readily identify what equipment belongs to whom." Hawaiian Electric also verbally stated at the December 11, 2023, status update meeting that "Hawaiian Electric prioritizes which poles it removes by categorizing them as either "high", "medium", or "low" priority." In the Application Exhibit B at 15, Hawaiian Electric introduces vegetation management as part of the stipulation in that "[t]he subcommittee discussed that vegetation management can speed up pole transfers." In Application Exhibit B at 3, Hawaiian Electric introduces dashboarding as part of the stipulation on the "concept of using Alden ONE, at no cost to the Stakeholders."3

Please respond to the following:

a) Please describe in detail if and how any of the new processes and process improvements presented in the Application contribute to reduction in the cost to remove a) a double pole requiring a standard transfer; b) a preventive double pole requiring a standard transfer.

b) Has Hawaiian Electric established a priority system for the remediation of double poles? If so, please describe the priority system.

c) Please describe in detail the criteria that Hawaiian Electric utilizes to determine what vegetation management is required by each stakeholder. Please cite where the vegetation management requirements exist in the current pole attachment contracts or agreements, and how any new requirements will be documented or added to the existing contracts or agreements.

d) Please provide a detailed description of the information and data regarding the status of double poles and double pole removals that will be made available to the general public via outreach, communication, and dashboarding.

Hawaiian Electric Response:

a) As described throughout the Application and the Stipulated Agreements, the stipulated improvements to the double pole process will promote clarity in day-today transfer and removal activities, better communication among the Stakeholders and Hawaiian Electric, efficiency gains by sharing contractors out in the field, and more accountability and transparent reporting on a going forward basis. The Company and the Stakeholders believe this clarity will contribute to more efficient processes, which will in turn reduce removal time and associated costs. Please see the below chart for information on how the new processes will contribute to a reduction in costs to remove double poles with standard transfers. Hawaiian Electric foresees stipulations 5 through 9 will help reduce costs more than others, but the Company and the Stakeholders will have to continue making forward progress in order to provide a more detailed estimate of cost reductions. As set forth in the Application and verbally at the Stakeholder meetings, the process for removing backlog and preventive double poles is the same, so the Company anticipates the stipulations will affect both types of double poles in the same way.

Stipulation/Exhibit	Ways it can reduce costs	Reference
1) Use of shared double pole database	Automated communication and data repository can minimize time spent on manual communication. Can limit time spend on communicating, coordinating, and performing transfers and other double pole related work.	Exhibit B, p. 2-4
2) Automated NOIs	Automated and timely NOIs may allow parties to plan their new installations and transfers more effectively.	Exhibit B, p. 4
3) Timely Notice of Transfer Completions	Notice to Hawaiian Electric allows Hawaiian Electric to timely remove bare pole and eliminates multiple trips to a site	Exhibit B, p. 5
4) Regular Meetings	Standing meetings allow Stakeholders to address issues and present new ideas, thereby minimizing redundant work or unsolved issues that can cause delays	Exhibit B, p. 6
5) Shared Contractors	Can allow multiple parties to utilize one contractor to perform multiple transfers on a pole, thereby ideally reducing cost of overall transfer and cost to each party	Exhibit B, p. 6-8
6) Utilizing Union(s)	Hawaiian Electric is discussing potential participation with its union in performing certain transfers, which could also reduce cost	Exhibit B, p. 8-9

	of overall transfer by limiting the number of different contractors that have to work on each pole.	
7) Non-Standard Transfer Coordination	Coordination of non-standard transfers between HT and Charter could allow a single contractor to perform both transfers installation of any necessary cross-arms, thereby limiting the number of different contractors that have to work on each pole.	Exhibit B, p. 9-10
8) Joint Permits	Consolidation of multiple parties' work related to a single pole under a joint permit would minimize redundant work and the associated costs.	Exhibit B, p. 10-11
9) Joint Trenching Verification Process	Minimizing the need for each party to obtain its own wet signatures could minimize redundant work and the associated costs.	Exhibit B, p. 11-13
10) Tagging	Allows all parties to more easily coordinate transfers without having to make multiple trips to a pole, because all parties will know which equipment belongs to which entity.	Exhibit B, p. 13-14
11) Tagging	Stakeholders agree to supply their respective tags to any approved contractors so trips to the pole by different parties to transfer and then tag equipment are limited.	Exhibit B, p. 14-15
12) Vegetation Management	Stakeholders all agree to timely respond to reasonable vegetation management requests that impact double pole transfers and removals, thereby limiting multiple trips to a pole.	Exhibit B, p. 15
15) Abandoned Cables	Removal of abandoned cables limits the amount of work that a particular stakeholder needs to perform in order to transfer equipment to the new pole, thereby reducing time and cost to remove a double pole	Exhibit B, p. 15-16
Organization-specific items from Application Exhibits	• Hawaiian Electric has recently issued an RFP to reduce vendor costs by providing bulk requirements. The bids received so far significantly decrease the per-pole transfer and removal costs for standard transfers. • Coordination of non-standard transfers • Centralized software program, tagging improvements and increased meetings to reduce redundancies	• Company's responses to PUC-IR-1; CA-IR-7; Exhibit C p. 5. • HT Exhibit D • C&C Exhibit D, pages 3-5

b) Hawaiian Electric considers several factors when determining the priority for the remediation of double poles. As discussed in the stakeholder meetings earlier this year, Hawaiian Electric established a high ("H"), medium ("M"), low ("L") rating to assist with categorizing the priority of double poles. An "H" rating involves a priority safety issue like a serious leaning double pole, a double pole broken at the base, or a double that exists or is created in the current designated wildfire risk mitigation areas. It also includes high profile customer or repeat customer escalations that cannot be lowered to a "M" or "L" rating. A "M" rating is reserved for less serious issues like where a pole could have been leaning but is temporarily braced or secured until the double pole can be addressed. An "L" rating is reserved for poles that are more cosmetic in nature and does not pose a serious risk to the operational integrity of the electric system or to public safety. Despite having these criteria, each double pole situation is different and involves interpretation and subjectivity.

c) Hawaiian Electric has a dedicated group that performs cyclical preventive vegetation management and that also responds to more urgent vegetation management needs. Hawaiian Electric is responsible for maintaining the vegetation on and in the immediate vicinity of its own equipment, which typically is the electrical equipment located at the top of the pole. Third-party attachers are similarly responsible for vegetation management on and in the immediate vicinity of their equipment.[1] The PIE Division is responsible for proposing amendments to the pole attachment agreements it has with third-party attachers. It plans to propose new language in its next round of negotiations, but in the past this has been a

[1] *See*, License Agreement for Pole Attachments ("LAPA") at section 8; Operating Agreement between Hawaiian Electric and HT at section 21, as partially amended in the parties' Comprehensive Settlement Agreement dated May 20, 2024.

difficult topic to find agreement with the attachers on. Attachers, as renters on the poles, typically prioritize the operability of their own equipment as the basis for when vegetation management is required, whereas the Company prioritizes the safety and reliability of the pole, the entire distribution system, and public safety. As a result, the Company and the attachers differ in viewpoints of when vegetation management is required. See also the Company's response to CA-IR-6.

d) The Company does not yet have an established means for public review of the double pole remediation progress, but is exploring options for the best way to make the information publicly available, including the option of having a page on the Company's website to track how many poles are removed on a monthly basis.

PUC-HECO-IR-03

Reference: "Application Hawaiian Electric; Exhibit C; Verification," filed on April 30, 2024 ("Application"), at 3. Hawaii Administrative Rules Chapter 6-80-80. "Application Hawaiian Electric"; Docket No. 2023-0311, filed September 19, 2023, Exhibit 1, at 6. "Application Hawaiian Electric"; Docket No. 2023-0175, filed February 8, 2023, Exhibit 1, at 6. "Application Hawaiian Electric"; Docket No. 2023-0176, filed February 8, 2023, Exhibit 1 at 7. "Hawaiian Electric Responses to PUC-HECO-IR-5b"; Docket No. 2023-0311, filed February 8, 2024, at 12.

In the Application at 3, Hawaiian Electric states that "[i]n its license agreements with carriers, Hawaiian Electric remains aware that it cannot unilaterally impose any requirements and that it must work within its bargaining power to get parties to agree on any terms." Hawaii Administrative Rules 6-80-80 state that "[a]ny entity that adds to or modifies its existing attachment after receiving such notification shall bear a proportionate share of the costs incurred by the owner in making such pole, duct, conduct, or right-of-way accessible." In the Application Docket No. 2023-0311 Exhibit 1 at 6 and Application Docket No. 2023-0175 Exhibit 1 at 6 and Application Docket No. 2023-0176 Exhibit 1 at 7, Hawaiian Electric states in its Site License Agreements ("SLA") that "In the event that Hawaiian Electric determines, in its reasonable discretion, that any Licensed Site is necessary for Hawaiian Electric's use in serving its customers or in meeting any of its regulatory obligations, or its obligations under any financing, land use or other agreement, Hawaiian Electric may terminate any Permit issued hereunder by giving at least [redacted] prior written notice." In Responses to PUC-HECO-IR-5b Docket No. 2023-0311 at 12, Hawaiian Electric states that "[attacher] would be required to remove and potentially modify its equipment based on the new or upgraded structure," continuing to add that "Hawaiian Electric would provide [attacher] written notice pursuant to SLA section 3.6.1 and would work with [the attacher] to coordinate the timely removal or transfer of [attacher's] equipment."

Please respond to the following:

a) Has Hawaiian Electric further investigated efforts to revise existing contract language for any license agreements currently in place with each pole attaching entity, to ensure the attaching entity responds within the given timelines established by Hawaiian Electric, to perform equipment transfers? Has Hawaiian Electric further investigated efforts to establish penalties if attaching entities do not respond or act within the required times established by Hawaiian Electric, to perform equipment transfers?

b) Does Hawaiian Electric believe that modification of HAR Chapter 6-80-80 to include mandatory timeframes and or corrective action is necessary to prevent the creation of and remove the backlog of double poles?

c) Docket No.'s 2023-0175, 2023-0176, and 2023-0311 filed by Hawaiian Electric include proposed Site License Agreements (SLA's) for third party colocations on Hawaiian Electric structures, property, etc. Has Hawaiian Electric considered revising the existing pole attachment agreements and contract language to include language that is similar to the language used in the proposed colocation SLA's, regarding actions taken if colocation entities do not comply with deadlines established by Hawaiian Electric in the SLA's?

Hawaiian Electric Response:

a) Hawaiian Electric is considering revisiting its pole attachment agreements to update and renegotiate several terms. Hawaiian Electric will do its best to negotiate more stringent obligations and timelines regarding transfer and remediation of any attachments, as applicable. However, because pole attachments and pole attachment agreements are subject to federal regulation by the FCC, Hawaiian Electric is constrained by the parameters of federal regulation in what types of requirements and penalties it can impose on attachers and by its bargaining power with the attachers. Until that time, the Company believes some of the Stipulations in this Application improve certain transfer timelines.

b) To the extent that Commission authority extends to the attachers and is not preempted by federal regulations by the FCC, the Commission updating its administrative rules to include transfer requirements for attachers could be helpful. *See*, 47 U.S.C. § 224(b)-(c).

c) See the Company's response to subpart (a). The Company would like to clarify that the SLA covers colocation sites (often large monopole or lattice tower structures) and is not under FCC jurisdiction. Once a third-party attacher's colocation equipment is up on a tower structure, it is there for 20+ years, and the tower itself is not typically replaced or changed out like a wooden distribution pole. As a result, certain terms in its SLAs are more favorable to the Company and/or are met with less opposition by the carrier because they are more typical industry norms for long-term colocation installations versus federally regulated pole attachments.

PUC-HECO-IR-04

Reference: "Application Hawaiian Electric; Exhibit A; Verification," filed on April 30, 2024 ("Application"), at 21. Application, at 10.

In the Application at 21, Hawaiian Electric states that it "targets to complete the transfer/removal of approximately 1,300 backlog double poles per year." In the Application at 10, Hawaiian Electric states that "[t]he Parties have agreed to sixteen specific stipulations that ... the Parties believe to be the most impactful to improving the efficiency and rate of double pole removals."

Please respond to the following:

a) Please confirm if Hawaiian Electric's statement in the Application pertains to transfer/removal of 1,300 backlog double poles per year for every year going forward. If not, then how many years is this statement referring to?

b) Please confirm if Hawaiian Electric's statement in the Application pertains to the transfer/removal of 1,300 backlog double poles per year for double poles requiring standard transfers, non-standard transfers, or both.

c) Provide the last known double pole removal procedure for double poles requiring standard transfers and double poles requiring non-standard transfers, prior to recently implemented efficiencies. Please also provide the proposed new double pole removal procedure, either in workflow diagram or grocery list style, for double poles requiring standard transfers and double poles requiring non-standard transfers.

Hawaiian Electric Response:

a) The Company committed to removing all standard transfer backlog double poles within 10 years of the asset transfer from Hawaiian Telcom ("HT"). *See*, Application at pgs. 7, Docket No. 2018-0075. Accordingly, the Company confirms that the commitment related to standard transfer backlog double poles only applies to the remaining four (4) years of the 10-year period. The portion of the Application that the Commission cites from page 10, however, that relates to the projected positive impacts of the stipulations, is intended to apply to all pole removals—backlog and preventive.

b) Hawaiian Electric is only responsible for performing standard transfers, so Hawaiian Electric's commitment to remove approximately 1,300 backlog double poles per year only applies to standard transfers. *See* Pole Licensing Agreement at § 9 of Annex 1 and footnote 2 to Exhibit B to Hawaiian Electric's Application for an explanation of division of responsibilities and distinction regarding standard versus non-standard transfers.

c) Once a double pole is identified, a determination is made to confirm if it involves a standard or non-standard transfer of HT's equipment. If the double pole involves a non-standard transfer, the information is sent to HT to complete the non-standard transfer process, often with Charter.

Note that Hawaiian Electric is only responsible for performing standard HT transfers and not non-standard HT transfers. Once it is confirmed that the double pole involves a standard transfer, it is assigned to one of Hawaiian Electric's approved contractors to complete the standard transfer of HT's equipment. Additional research is performed to identify other non-HT entities still attached to the double pole and, if present, follow-up notifications will be sent to these other entities to complete their transfers.

The proposed Stipulated Comprehensive Double Pole Removal Plan is expected to improve the current process by, and not limited to:

1. Use of a shared double pole database by all stakeholders. This is anticipated to centralize all communication between stakeholders for a given double pole, rather than rely on individual emails that require timely researching to locate. It is also anticipated that status reports by individual stakeholder can be run to confirm which stakeholders have and have not completed their transfers so Hawaiian Electric can schedule the standard HT transfer and double pole removal.

2. Automating the NOI process for each island. This is anticipated to centralize all NOI communication between stakeholders for pole replacements and allow all attaching stakeholders for that specific pole to see each other's response status.

3. Better coordination with shared contractors. For those stakeholders that are using contractors to perform equipment transfers in the communication space, the proposed stipulation plan raised the attention and commitment to coordinate contractor resources to reduce time and costs related to double pole remediation.

4. Tagging existing cables during double pole remediation. This will allow Hawaiian Electric to better identify whose cables are attached to the pole and help to determine if the double pole will involve a standard or non-standard HT transfer.

Please also see the Company's response to PUC-HECO-IR-2(a) for information on the benefits of the future process established in the Stipulated Agreement.

PUC-HECO-IR-05

Reference: "Application Hawaiian Electric; Exhibit B; Verification," filed on April 30, 2024 ("Application"), at 6-9. Application, at 10-11.

In the Application at 6-9, Hawaiian Electric states that as part of Stipulation 5 "applicable Stakeholders agree to share their respective approved contractor list and use reasonable efforts to allow certain qualified contractors to move their equipment at the same time that such contractors are moving equipment of other Stakeholders, and then be invoiced accordingly." In the Application at 10-11, Hawaiian Electric states that "[t]his can minimize the number of different contractors that need to schedule and perform transfer work on a specific pole and limit how many times contractors or union crews go to that pole, thereby accelerating the pace of transfers and removals."

Please respond to the following:

a. Does Hawaiian Electric anticipate that increasing the list of eligible contractors will speed up the equipment transfer and double pole removal process?

b. Please confirm that with all improved initiatives identified in the stipulations, there will be sufficient labor resources to achieve Hawaiian Electric's projected removal goals.

Hawaiian Electric Response:

a. It should. The approved, eligible contractor list is a list Hawaiian Electric provides to carriers so they know who they can call on to perform work in the field that has already been vetted by the Company. The Company has issued an RFP and is in the process of awarding contractors to perform standard transfers. See the Company's responses to PUC-HECO-IR-1, CA-IR 7 for more on the Company's RFP. The Company expects its approved contractor list for standard transfers will be approved and used by HT, Charter and other carriers to transfer their equipment, hopefully under the One Touch concept. For non-standard transfers, HT and Charter will work on an agreement for approved contractors between themselves to utilize a single contractor to perform non-standard transfer work. The more parties that agree on approved contractors that can perform multiple attachers' transfers at once, the more efficient the transfer and pole removal process will become.

b. Hawaiian Electric is doing its best to provide the appropriate resources to the double pole initiative, and currently has staffing to meet the double pole needs. The budget to pay for double pole removals and contractor availability to perform the work have historically been the limiting factors for the Company, but the Company has been exploring ways to reduce costs of removals and therefore confirms it will meet its projected goals. Hawaiian Electric cannot confirm whether other relevant stakeholders will have sufficient labor resources to achieve their projected goals. The Company would also like to point out that any extra responsibilities that result from this docket may require additional resources beyond what the Company currently has estimated to perform existing work.

PUC-HECO-IR-06

Reference: "Application Hawaiian Electric; Exhibit B; Verification," filed on April 30, 2024 ("Application"), at 2.

Hawaiian Electric admits that there is "[c]urrently there is no single database for tracking double pole equipment and transfers."

a) Please describe in detail Hawaiian Electric's plans and implementation schedules to develop a single database for use between the different operating companies Hawaiian Electric Company, Maui Electric, and Hawaii Electric Light. If Hawaiian Electric has no plans to consolidate its databases, please explain why not.

b) Please describe in detail Hawaiian Electric's plans and implementation schedules to improve its current individual databases for tracking double pole equipment transfers and double pole removals, and to improve the methods for gathering data, metrics, and status from its various databases (PIE, joint pole, etc.). Please include the implementation schedule for such improvements. If Hawaiian Electric has no plans to improve its databases, please explain why not.

Hawaiian Electric Response:

a) The Company is currently exploring expanding Alden One, which could consolidate the various databases used for multiple tasks associated with third-party attachers. If Alden One is not able to meet Hawaiian Electric's expansion needs, in particular the cybersecurity requirements, then the Company would issue another RFP and accept bids from other service providers, similar to Alden One, that would better fit the Company's priorities and cybersecurity needs.

b) The Company continues to use its individual island Joint Pole databases to track double poles and transfer status. These databases operate as effectively and efficiently as they can. The Company is proposing to expand the use of Alden ONE, which is currently being used with attaching stakeholders to manage and address pole attachment violations, to further include management and notification to stakeholders of pole replacements and double pole transfer status and completions. Such tasks would also be merged with pole data currently in SAP so that JP notifications and other notices to stakeholders can be issued through Alden ONE. This process still needs to be vetted and adopted by the Company, but the preferred method is to expand Alden One to combine all current databases together, as opposed to trying to improve any one single database. The Company included the future use of Alden ONE for the management of double poles and tracking of double pole transfer and removal status/notifications in its recent RFP. Please also see the Company's responses to CA-IRs 1-3.

PUC-HECO-IR-07

Reference: "Application Hawaiian Electric; Verification," filed on April 30, 2024 ("Application"), at 7.

Hawaiian Electric states that "[d]ouble poles identified, in part, by a 2018 audit are referred to as "backlog" double poles."

Is Hawaiian Electric planning to conduct or otherwise complete any pole attachment inventory audit that may be ongoing? If such a pole attachment inventory audit was completed, please provide either the report or a summary of the report.

Hawaiian Electric Response:

Hawaiian Electric is currently in the process of conducting a service-wide pole attachment inventory audit. The Company's auditor has completed auditing O‘ahu and Hawai‘i Island and is currently auditing Maui County. This audit is not related to any prior audits that have been done and is intended to capture the volume of attachments on the Company's poles and to identify obvious NESC violations.

The table below includes a summary of pole attachments per party on each island that has been completed.

Party Name	O‘ahu number of attachments	Hawai‘i Island number of attachments
Hawaiian Telcom	51,081	46,487
Charter	49,212	36,054
Verizon	63	0
Servpac	882	0
AT&T	265	36
Crown Castle	40	0
Lumen/Level 3	205	11

PUC-HECO-IR-08

Reference: "Application Hawaiian Electric; Verification," filed on April 4, 2018 ("HT HECO Transfer Application"), Docket No. 2018-0075, at 23, 4, and 35.

In HT HECO Transfer Application at 23, Applicants state that "[t]he baseline double pole field survey will provide details on the condition of all poles in question, the exact quantity of poles, the quantity of attachments on the poles, and whether the transfer work is standard and will now be the responsibility of Hawaiian Electric Companies to perform, or non-standard and remain the responsibility of Hawaiian Telcom to perform."

In HT HECO Transfer Application at 23, Applicants also state that:

"The Hawaiian Electric Companies have committed to performing a minimum of 1,000 standard transfers and double pole removals per year. Hawaiian Telcom has committed to performing a minimum of 50 non-standard transfers and double pole removals per year. The double pole backlog will be brought to a net zero within ten years."

In HT HECO Transfer Application at 4, further, Applicants claim that one of the most notable benefits of the new arrangement is the "[r]emoval of double poles: Effectively eliminating future and addressing current double poles by instituting a collaborative remediation effort identifying, planning and committing to equipment transfers and the removal of approximately 14,000 double poles."

In HT HECO Transfer Application at 35, lastly, Applicants assert that "[t]he attachment fees paid by Hawaiian Telcom will be used to remediate a significant portion of the backlog of double poles. Hawaiian Electric Companies' customers will not bear the burden of these costs, as any attachment materials for Hawaiian Telcom facilities will be provided and paid for by Hawaiian Telcom and all non-standard transfers of Hawaiian Telcom equipment shall be performed by Hawaiian Telcom, including the removal of the old pole, at their cost."

Please respond to the following:

a) For the double poles that require non-standard transfers and pole removals by Hawaiian Telcom, please confirm that Hawaiian Telcom can meet its commitment of bringing its non-standard transfer double pole backlog to a net zero by the end of the ten-year period (April 24, 2028). If so, please provide Hawaiian Telcom's proposed double pole removal schedule from present through April 24, 2028.

b) Please confirm that Hawaiian Telcom's work and costs to perform the non-standard transfers and double pole removals are NOT included in the cost estimates, schedules, or implementation plans provided in this Application (Docket No. 2024-0121).

c) Please explain in detail why Hawaiian Electric is now unable to meet its commitment to effectively eliminate future and addressing current double poles as referenced, without requiring additional funding.

Hawaiian Electric Response:

a) Hawaiian Telcom confirms its commitment to reduce its non-standard transfer double pole backlog to a net zero by April 24, 2028. See Exhibit D of the application for Hawaiian Telcom's proposed double pole removal schedule from the present date through April 24, 2028. This schedule encompasses the initial backlog and any new double poles that may be created during this period.

b) Hawaiian Telcom confirms that the work and associated costs for performing non-standard transfers and double pole removals are not included in the cost estimates, schedules, or implementation plans provided in this application (Docket No. 2024-0121).

a) and b) Prepared By:	Daniel Masutomi
Sponsor:	Daniel Masutomi Director – Network Planning & Engineering Hawaiian Telcom

c) Hawaiian Electric's request for additional funding does not mean that the Company is unable to meet its commitment to remove all backlog double poles by end of 2028. Instead, Hawaiian Electric's request for additional funds was to expedite the removal of such backlog double poles since the issue is of such high priority to the Legislature and this Commission, which would free up more resources to be used on preventive double pole removals. See Exhibit C to the Application at page 6 regarding how additional funding may accelerate the pace of double pole removals. Please also see the Company's response to PUC-HECO-IR-1 and CA-IR-8.